

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 1:23-cr-10039-DJC
)	
JOHN SULLIVAN,)	
Defendant)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Now comes the Defendant, *John Sullivan*, by and through his Counsel in the above-referenced criminal indictment and respectfully requests this Honorable Court allow him to file medical records under seal.

In support of this motion, the Defendant will be a motion for compassionate release along with exhibits. Public disclosure of this information would violate the Defendant's privacy rights. The Government indicates their assent to this motion to file these exhibits under seal.

WHEREFORE, the Defendant moves this Honorable Court to Allow his motion.

DATE: December 20, 2024

Respectfully submitted,
John Sullivan
By his attorney,

/s/ Jeffrey Miller
Jeffrey Miller, Esq.
60 Leo Birmingham Pkwy., Ste. 103
Boston, MA 02135
BBO # 670561
(617) 482-5799
jmiller@millercriminaldefense.com

CERTIFICATE OF SERVICE

I, Jeffrey Miller, hereby certify that this document, filed through the ECF System, will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF), and that papers will be sent to all non-registered participants who have appeared in this case.

/s/ Jeffrey Miller
Jeffrey Miller